

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In re:) CASE NO. 16-17350-pmm
) JUDGE Patricia M. Mayer
)
Jeffrey Donald Nikoleyczik)
Lori Ann Nikoleyczik)
)
Debtors.)
)
)
)

**NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING NOTICE OF
DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 05/01/2020 through 07/01/2020. Creditor holds a secured interest in real property commonly known as 2346 MAIN ST NORTHAMPTON, Pennsylvania 18067 as evidenced by claim number 22-2 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 07/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC
Authorized Agent for Secured Creditor
10700 Abbott’s Bridge Road, Suite 170
Duluth, GA 30097
Telephone: (470) 321-7112

By: /s/Erin Elam
Erin Elam, Esquire
Email: eelam@rascrane.com

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 30th day of April 2020.:

**Jeffrey Donald Nikoleyczik
Lori Ann Nikoleyczik
2346 Main Street
Northampton, PA 18067-1101**

And via electronic mail to:

**J. ZAC CHRISTMAN
Fisher Christman
530 Main Street
Stroudsburg, PA 18360**

**FREDERICK L. REIGLE
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Interim Chapter 13 Trustee
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